

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

SERGIO BONILLA HENRIQUEZ,

Defendant.

Case No. 2:20-CR-0100-TOR

STIPULATED PROTECTIVE  
ORDER REGARDING  
IDENTIFICATION OF MINOR  
VICTIMS PURSUANT TO  
18 U.S.C. § 3509

The Court has received and reviewed the Stipulation for Protective Order Regarding Identification of Minor Victims Pursuant to 18 U.S.C. § 3509, filed by the parties in the above-captioned matter, and is fully advised.

GOOD CAUSE HAVING BEEN SHOWN, the Court hereby ORDERS that the Stipulated Motion for Protective Order Regarding Identification of Minor Victims Pursuant to 18 U.S.C. § 3509, ECF No. 24, is **GRANTED**.

1. IT IS FURTHER ORDERED that the privacy protection measures mandated by 18 U.S.C. § 3509(d), which apply when a case involves a person under the age of eighteen years who is alleged to be a victim of a crime of sexual exploitation, or a witness to a crime committed against another person, apply to this case.

1           2.     IT IS FURTHER ORDERED that all persons acting in this case in a  
2 capacity described in 18 U.S.C. § 3509(d)(1)(B), shall:

- 3           a.     Keep all documents that disclose the names, identities, or any  
4                 other information concerning minors in a secure place to which  
5                 no person who does not have reason to know their contents has  
6                 access;
- 7           b.     Disclose such documents or the information in them that  
8                 concerns minors only to persons who, by reason of their  
9                 participation in the proceeding, have reason to know such  
10                information;
- 11          c.     Not permit Defendant himself to review discovery outside the  
12                 presence of defense counsel or a defense investigator;
- 13          d.     Not permit Defendant to keep discovery in his own possession  
14                 outside the presence of defense counsel or a defense  
15                 investigator; and
- 16          e.     Not permit Defendant to keep, copy, or record the identities of  
17                 any minor or victim identified in discovery in this case.  
18

19           3.     IT IS FURTHER ORDERED that all papers to be filed in Court that  
20 disclose the names or any other information identifying or concerning minors shall  
21 be filed under seal without necessity of obtaining a Court order, and that the person  
22 who makes the filing shall submit to the Clerk of the Court:

- 23           a.     The complete paper to be kept under seal; and
- 24           b.     The paper with the portions of it that disclose the names or  
25                 other information identifying or concerning children redacted,  
26                 to be placed in the public record.  
27  
28

1           4.     IT IS FURTHER ORDERED that the parties and the witnesses shall  
2 not disclose minors' identities during any proceedings connected with this case.  
3 The parties and witnesses will refer to alleged minor victims only by using agreed-  
4 upon initials or pseudonyms (e.g., "Minor Victim 1"), rather than their bona fide  
5 names, in motions practice, opening statements, during the presentation of  
6 evidence, in closing arguments, and during sentencing.

7           5.     IT IS FURTHER ORDERED that the government may produce  
8 discovery to the defense that discloses the identity and images of alleged minor  
9 victims in this case, in order to comply with the government's discovery  
10 obligations. Defendant, the defense team, Defendant's attorneys and investigators,  
11 and all of their externs, employees, and/or staff members, shall keep this  
12 information confidential as set forth above.

13           6.     IT IS FURTHER ORDERED that this ORDER shall apply to any  
14 attorneys who subsequently become counsel of record, without the need to renew  
15 or alter the ORDER.

16           7.     IT IS FURTHER ORDERED that this ORDER shall apply to the  
17 personal identifying information and images of any minors who are identified over  
18 the course of the case, whether or not such minors are known to the government  
19 and/or Defendant at the time the ORDER is entered by the Court.

20           IT IS SO ORDERED. The Clerk shall enter this Order and furnish copies to  
21 counsel.

22           Dated this 10th day of September 2020.



A handwritten signature in blue ink that reads "Thomas O. Rice".

Thomas O. Rice  
United States District Judge